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8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

11 VANESSA LIBRERA,

12 Plaintiff,

13 vs.

14 ALBERTSON'S, LLC d/b/a  
15 ALBERTSON'S; ALBERTSON'S STORES  
SUB LLC; ABS NV-O LLC; DOES 1  
16 through 100 and ROE CORPORATIONS 1  
through 100, inclusive,

17 Defendants.  
18

Case No.: 2:18-cv-00873-JCM-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS'  
MOTIONS IN LIMINE (FIRST  
REQUEST)**

19 IT IS HEREBY STIPULATED by and between Plaintiff VANESSA LIBRERA  
20 ("Plaintiff"), by and through her counsel of record, FARHAN R. NAQVI and ELIZABETH E.  
21 COATS of NAQVI INJURY LAW, and Defendants ALBERTSON'S LLC d/b/a  
22 ALBERTSON'S, ALBERTSON'S STORES SUB LLC and ABS NV-O LLC STATE FARM,  
23 by and through their counsel of record, JACK P. BURDEN, ESQ. of BACKUS, CARRANZA &  
24 BURDEN, that Plaintiff be granted an extension of time in which to file responsive pleadings to  
25 Defendants' motions in limine filed on July 16, 2020, which include the following:  
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- 27 1. *Defendants' Motion in Limine No. 1.: To Exclude Sedgwick Claims Management*  
28 *Pre-Litigation Claims File* [ECF Doc. 47]



2. *Defendants' Motion in Limine No. 2: To Exclude Evidence of all Prior Incidents, Reports, Lawsuits or Claims* [ECF Doc. 48]
3. *Defendants' Motion in Limine No. 3: To Exclude Articles on Safety, Preventable Deaths, and Cart Corral Maintenance* [ECF Doc. 49]
4. *Defendants' Motion in Limine No. 4: To Exclude Any Testimony, Evidence or Questioning Regarding the Installation and Inspection of the Cart Corral* [ECF Doc. 50]
5. *Defendants' Motion in Limine No. 5: To Exclude Testimony, Evidence Regarding Unavailability of any Witnesses* [ECF Doc. 51]
6. *Defendants' Motion in Limine No. 6: To Exclude Plaintiff from Presenting Arguments Based Upon Reptilian Theory, the Golden Rule or Safety Rules* [ECF Doc. 52]

The parties stipulate that the deadline for Plaintiff's responsive pleadings to the aforementioned motions be up to and including **August 14, 2020**. This is the first stipulation for extension of time to file Plaintiff's responsive pleadings to the subject motions. The trial in this matter is currently set for January 25, 2021.

DATED this 21<sup>st</sup> day of July, 2020.

NAQVI INJURY LAW

/s/ Elizabeth E. Coats  
 FARHAN R. NAQVI  
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 Las Vegas, Nevada 89147  
*Counsel for Plaintiff*

DATED this 21<sup>st</sup> day of July, 2020.

BACKUS, CARRAZNA & BURDEN

/s/ Jack P. Burden  
 JACK P. BURDEN, ESQ.  
 Nevada Bar No. 6918  
 3050 South Durango Drive  
 Las Vegas, Nevada 89117  
*Counsel for Defendants*

**IT IS SO ORDERED:**

*James C. Mahan*  
 UNITED STATES DISTRICT JUDGE

DATED: July 27, 2020

